

FILED

STATE OF MINNESOTA
SPECIAL REDISTRICTING PANEL

December 7, 2021

OFFICE OF
APPELLATE COURTS

A21-0243
A21-0546

Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota,

Plaintiffs,

and

Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman, Carol Wegner, and Daniel Schonhardt,

Plaintiff-Intervenors

**WATTSON PLAINTIFFS’
NOTICE OF MOTION AND MOTION
TO ADOPT CONGRESSIONAL AND
LEGISLATIVE REDISTRICTING
PLANS**

vs.

Steve Simon, Secretary of State of Minnesota; and Kendra Olson, Carver County Elections and Licensing Manager, individually and on behalf of all Minnesota county chief election officers,

Defendants,

and

Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer Guertin, Garrison O’Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main, and Wayne Grimmer,

Plaintiffs,

and

Dr. Bruce Corrie, Shelly Diaz, Alberder
Gillespie, Xiongpaoo Lee, Abdirazak
Mahboub, Aida Simon, Beatriz Winters,
Common Cause, OneMinnesota.org, and
Voices for Racial Justice,

Plaintiff-Intervenors,

vs.

Steve Simon, Secretary of State of
Minnesota,

Defendant.

TO: Defendant Steve Simon, Secretary of State of Minnesota, through his Attorneys
Angela Behrens and Nathan J. Hartshorn, Minnesota Attorney General's Office, 445
Minnesota Street, Suite 1400, St. Paul, MN 55101.

Defendant Kendra Olson, Carver County Elections and Licensing Manager, through her
Attorney Jennifer Tichey, Carver County Attorney, 604 E. 4th Street, Chaska, MN 55318.

Plaintiff-Intervenors Paul Anderson, Ida Lano, Chuck Brusven, Karen Lane, Joel Hineman,
Carol Wegner, and Daniel Schonhardt, through their attorneys Elizabeth M. Brama, Maren
M. Forde, and Samuel N. Louwagie, Taft Stettinius & Hollister LLP, 2200 IDS Center, 80
S 8th Street, Minneapolis, MN 55402.

Plaintiffs Frank Sachs, Dagny Heimisdottir, Michael Arulfo, Tanwi Prigge, Jennifer
Guertin, Garrison O'Keith McMurtrey, Mara Lee Glubka, Jeffrey Strand, Danielle Main,
and Wayne Grimmer, through their attorneys Charles N. Nauen, David J. Zoll, Kristen G.
Marttila and Rachel A. Kitze Collins, Lockridge, Grindal Nauen P.L.L.P., 100 Washington
Avenue South, Suite 2200, Minneapolis, MN 55401.

Plaintiff-Intervenors Dr. Bruce Corrie, Shelly Diaz, Alberder Gillespie, Xiongpaoo Lee,
Abdirazak Mahboub, Aida Simon, Beatriz Winters, Common Cause, OneMinnesota.org,
and Voices for Racial Justice, through their attorneys Brian A. Dillon and Amy Erickson,
Lathrom GPM, LLP, 80 S Eighth Street, 500 IDS Center, Minneapolis, MN 55402.

NOTICE

PLEASE TAKE NOTICE, that on January 4, 2022, Plaintiffs Peter S. Wattson, Joseph Mansky, Nancy B. Greenwood, Mary E. Kupper, Douglas W. Backstrom and James E. Hougas III, individually and on behalf of all citizens and voting residents of Minnesota similarly situated, and League of Women Voters Minnesota (“Wattson Plaintiffs”) in the above-captioned matter, through their undersigned counsel, will move the Minnesota Special Redistricting Panel for the relief requested below.

MOTION

Pursuant to the Minnesota Special Redistricting Panel’s (the “Panel”) Order Dated October 26, 2021 and Order Stating Preliminary Conclusions, Redistricting Principles, and Requirements for Plan Submissions dated November 18, 2021, the Wattson Plaintiffs bring this motion to request that the Panel adopt the Congressional and Legislative Redistricting Plans filed by the Wattson Plaintiffs in this case. The Wattson Plaintiffs’ Redistricting Plans are Attached as Exhibits A and B to the Affidavit of Peter S. Wattson dated December 6, 2021 and were created using the Block Equivalency Files emailed to the Panel on December 7, 2021.

This Motion is based on the memorandum of law and supporting affidavits filed herewith, arguments of counsel, and all files, records, and proceedings herein.

Respectfully Submitted,

Date: December 7, 2021

JAMES H. GILBERT LAW GROUP, P.L.L.C.

By: /s/ Adam L. Sienkowski

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and James E. Hougas III and League of

Women Voters Minnesota